

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN THE MATTER OF:

HÉCTOR E. COLÓN RODRÍGUEZ

Debtor.

CASE NO.: 21-03364-MCF7

CHAPTER 7

MOTION REQUESTING LIFT FROM STAY AND AUTHORIZATION

TO THE HONORABLE COURT:

COMES NOW, parties in interest, Carmen Belén, Jaime Radamés and María Del Rosario, Colón Rodríguez, through the undersigned attorney and respectfully STATE, ALLEGE AND PRAY:

1. The parties in interest, Carmen Belén, Jaime Radamés and María Del Rosario, Colón Rodríguez, filed a torts' action against Debtor Héctor E. Colón Rodríguez on September 11th, 2009 under state civil case number B4CI2019-00120 at the Court of First Instance, Aibonito Superior Court (now held at the Court of First Instance, Orocovis Superior Court).

2. From a review of the Docket in the captioned case we can see that alleged notice to this attorney is certified of Debtor's documents but no mail has to this day received by the undersigned.

3. Furthermore, the Court of First Instance, Orocovis Superior Court, authorized under the referred case the sale of a real property in which Debtor has a participation with his siblings and authorization is requested to this Bankruptcy Court to order the appearance of Debtor

to the closing in order to comply with the Option Contract signed with the buyers since June 17th, 2021 (before the filing of this bankruptcy).

4. Therefore, parties in interest, Carmen Belén, Jaime Radamés and María Del Rosario, Colón Rodríguez, respectfully request this Honorable Court that pursuant to 11 U.S. Code § 362 - Automatic stay, (d) (1), to after notice and a hearing, grant relief from the stay provided under subsection (a) of this section, conditioning such stay for cause, including the lack of adequate protection of an interest in property of such party in interest if their torts' case proceedings is stayed because of Debtor's bankruptcy.

WHEREBY, it is respectfully requested the Honorable Court to GRANT parties in interest, Carmen Belén, Jaime Radamés and María Del Rosario, Colón Rodríguez' *Motion Requesting Lift From Stay* and order Debtor to appear at the closing authorized by the Court of First Instance, Orocovis Superior Court under case B4CI2019-00120.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 13th day of January, 2022.

I HEREBY CERTIFY that on this same date, a true copy of the foregoing was filed through the Court's CM/ECF system, which will generate a notice to all CM/ECF participants in this case.

s/ Francis T. Pagán
USDC PR No. 225412
PAGÁN, ORTEGA & ASSOCIATES LAW OFFICES
33 Resolución St.
Chubb Plaza, Suite 701-A
San Juan, Puerto Rico 00920
Phone No.: (787) 723-9393
Email: fpagan@poa-law.com